



A LCFS For Washington: Informing the Decision

Washington Department of Ecology
LCFS Workshop

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Agenda

TIAX Portions of Workshop

- 1 Scenario Analysis
- 2 Alternative Fuel Infrastructure Cost Assumptions
- 3 LCFS Implementation & Administration Cost Estimates**
- 4 LCFS Alternatives to be Considered
- Appendix: VISION Model Input Assumptions

Introduction

- There will be substantial workload to implementing an LCFS, both for developing a specific rule and then to implement the program once a rule is adopted.
- If we do move forward with an LCFS, we currently expect the funds for the rule and implementation costs will become budget requests. We have developed a draft budget request pending a decision on whether to move ahead with an LCFS.
- A different ongoing funding source for administration may need to be identified.

Methodology

- Define Rule Development and Implementation Activities
 - Started with CARB's write-up of LCFS rule development and implementation
 - Utilized TIAX's experience with the development and reporting of LCFS
 - Modified rule establishment tasks to fit WA processes
- Provided ECY workload and contractor level of effort estimates
- Presentation and feedback from stakeholders (currently)
- Need to understand work flows and take overlapping tasks into consideration

Rule Development:

3.25 FTE and \$325,000 consulting

A. Fine tune technical work – review existing rules

- i. Quantify baseline fuels & look-up tables
 - identifying sources
 - evaluating assumptions
 - establishing boundaries on available data
 - issuing report
- ii. Quantify compliance fuels & look-up tables
 - same subtasks as baseline fuels

B. Establish Rule

- i. Intent to develop rule (CR 101)
- ii. Advisory Committee meetings
- iii. Draft rule (CR 102), drafting & supp data
- iv. Environmental Review (EIS or Mitigated DNS)
- v. Public Hearings (4 East and West)
- vi. Final draft rule
- vii. Responsiveness summary inc economics & SBEIS

C. Legal Advice

D. Supervision

Initial Rule Implementation:

3.20 FTE and \$100,000 consulting

A. Guidelines for New Pathways

- i. Initial guidelines
- ii. Workshop/public comment
- iii. Final guideline

B. Reporting & Registration Tools for Fuel Suppliers

- i. Develop/Adapt (CA) forms & systems, including registrations
- ii. User training (online systems)
- iii. Guidance for biorefinery registration
- iv. Credit/debit accounting

C. Provisions for Regulated Parties of Electricity

D. Working with Partner Agencies

E. Respond to Legal Issues

F. Supervision

Ongoing Rule Implementation:

4.30 FTE and \$25,000 consulting

A. Registration and Reporting

- i. Process registrations, review & approve
- ii. Process quarterly reports, review, input data
- iii. Credit/debit accounting
- iv. Respond to problems, initiate compliance actions
- v. New User training
- vi. Data system maintenance

B. Provide Technical Assistance

C. Compliance

D. Lessons Learned/Changes to Implementation

- i. Update existing pathways
- ii. Update guidelines for new pathways
- iii. Update provisions for regulated parties of electricity
- iv. Update/refine credit/debit accounting

E. Working with Partner Agencies

F. Respond to Legal Challenges

G. Supervision